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Attorneys for Plaintiff and the Proposed Class

**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF CALIFORNIA**

SHYRIAA HENDERSON, on behalf  
of herself and all others similarly  
situated,

Plaintiff,

vs.

UNITED STUDENT AID FUNDS,  
INC. D/B/A USA FUNDS,

Defendant.

CASE NO. 3:13-cv-1845-JLS-BLM  
CLASS ACTION

**DECLARATION OF PLAINTIFF  
SHYRIAA HENDERSON IN  
SUPPORT OF RENEWED MOTION  
FOR CLASS CERTIFICATION**

Hearing date: July 7, 2016  
Time: 1:30 p.m.  
Courtroom: 4A – 4th Floor

1 Pursuant to 28 U.S.C. § 1746, I, Shyriaa Henderson, hereby declare and state  
2 as follows:

3 1. I understand that as the lead plaintiff in this action, I am representing  
4 the interests of individuals like myself, and that I have a fiduciary duty to those  
5 absent class members.

6 2. I am well-informed regarding the nature of this action and I have been  
7 and will remain committed to actively participating in each stage of the litigation,  
8 as necessary.

9 3. Beginning in September 2010 and continuing until August 2013, I  
10 received numerous autodialed, unsolicited phone calls to my cellular phone from  
11 Defendant's Collectors. I did not consent to the receipt of these calls. I never  
12 provided my phone numbers ending in -0571, -3279 and -2464 to Defendant. I did  
13 not even have that phone number at the times I applied for my loans. At times, due  
14 to the volume of calls, I did not answer the incoming unsolicited phone call;  
15 however, when I did answer the calls the caller would identify itself as calling on  
16 behalf of the Defendant, United Student Aid Funds.

17 4. I understand my duties as a class representative include giving truthful  
18 testimony at a deposition and at trial, if necessary. I have also actively participated  
19 in this litigation by assisting my counsel in the prosecution of my and Class's  
20 claims, including by assisting in their initial investigation, reviewing the initial and  
21 amended complaints prior to filing, providing information necessary to make initial  
22 disclosures on my behalf, and regularly discussing the status of the case with my  
23 counsel.

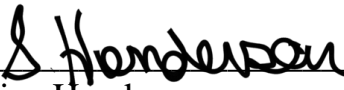
24 5. I take my obligations as a class representative seriously and intend to  
25 abide by them.

26 6. I did not bring this case to enrich myself, instead, it is important to me  
27 that Defendant stop harassing people on their cell phones by placing unauthorized  
28

1 autodialed calls. It is also important to me that Defendant pay the statutory  
2 damages to which the Class is entitled.

3 I declare under penalty of perjury that the foregoing is true and correct.

4 Executed on May 4, 2016 at Bayonne, New Jersey.

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6 Shyriaa Henderson  
7 Plaintiff and proposed Class Representative  
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